

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN :  
 :  
VS. :  
 :  
CITY OF PHILADELPHIA, ET AL. : NO: 2:18-cv-01107

- - -  
Philadelphia, Pennsylvania  
Thursday, October 25, 2018  
- - -

ORAL DEPOSITION of WARDEN CATHY TALMADGE,  
taken pursuant to notice, held in the offices of  
Strehlow Court Reporting, 1515 Market Street, Suite  
1045, Pennsylvania 19102 commencing at 9:58 a.m.,  
before Angela M. King, RPR, Court Reporter - Notary  
Public there being present.

- - -

STREHLOW & ASSOCIATES  
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October 25, 2018

| Page 2 |                                     | Page 4 |   |
|--------|-------------------------------------|--------|---|
| 1      |                                     | 1      | - - -   |
| 2      | A P P E A R A N C E S               | 2      | (It is agreed by and between counsel,                   |
| 3      |                                     | 3      | that reading, signing, sealing, filing and              |
| 4      | LAW OFFICES OF TROY WILSON          | 4      | certification are hereby waived and all objections,     |
| 5      | BY: TROY WILSON, Esquire            | 5      | except as to form of the questions, are reserved until  |
| 6      | 215 South Broad Street, 2nd Floor   | 6      | the time of trial.)                                     |
| 7      | Philadelphia, Pennsylvania 19107    | 7      | - - -   |
| 8      | Phone: (215) 985-4566               | 8      | WARDEN CATHY M. TALMADGE, having been                   |
| 9      | Email: troyhwilsons@att.net         | 9      | duly sworn, was examined and testified as follows:      |
| 10     | Representing the Plaintiff          | 10     | - - -   |
| 11     |                                     | 11     | EXAMINATION   |
| 12     | CITY OF PHILADELPHIA LAW DEPARTMENT | 12     | - - -   |
| 13     | BY: MARK J. MAGUIRE, Esquire        | 13     | BY MR. WILSON:  |
| 14     | 1515 Arch Street, 14th Floor        | 14     | Q. I want to introduce myself. My name is Troy          |
| 15     | Philadelphia, Pennsylvania 19102    | 15     | Wilson. I'm the attorney who represents the plaintiffs  |
| 16     | Phone: (215) 683-5361               | 16     | in reference to this particular federal civil lawsuit.  |
| 17     | Email: mark.maguire@phila.gov       | 17     | Few kind of general rules and regulations, and then     |
| 18     | Representing the Defendant          | 18     | I will let your attorney chime in as well when I'm done |
| 19     |                                     | 19     | with my little spiel.                                   |
| 20     |                                     | 20     | Generally, want to make sure you speak in a clear       |
| 21     |                                     | 21     | voice. Keep your voice up for the stenographer.         |
| 22     |                                     | 22     | Please, try not to answer with grunts or moans or       |
| 23     |                                     | 23     | uh-huh or uh-uh because no one knows that. She can't    |
| 24     |                                     | 24     | write that. No one knows what that means. If you        |
| Page 3 |                                     | Page 5 |   |
| 1      | I N D E X                           | 1      | don't understand a question, just tell me you don't     |
| 2      |                                     | 2      | understand the question. If you'd like me to rephrase   |
| 3      | WITNESS PAGE                        | 3      | the question because you don't understand it, please,   |
| 4      | WARDEN CATHY TALMADGE               | 4      | tell me to do so, and I will attempt to do so.          |
| 5      |                                     | 5      | Essentially at a deposition -- and I am going to        |
| 6      | EXAMINATION                         | 6      | get into that with you directly in a few moments. At a  |
| 7      | BY: MR. WILSON 4                    | 7      | deposition, you are legally required to answer each and |
| 8      |                                     | 8      | every question to the best of your ability unless you   |
| 9      |                                     | 9      | are instructed not to do so by your attorney.           |
| 10     | E X H I B I T S                     | 10     | Today, right now, are you taking any medication         |
| 11     | NUMBER DESCRIPTION PAGE             | 11     | that will preclude you from understanding my questions  |
| 12     | WILSON-1 TALMADGE MEMORANDUM 26     | 12     | or providing me with clear and truthful answers?        |
| 13     |                                     | 13     | A. No.  |
| 14     |                                     | 14     | Q. If you need to take a break, just let us know. But   |
| 15     |                                     | 15     | if want to take a break, the way it generally works is  |
| 16     |                                     | 16     | you have to answer whatever question is put before you  |
| 17     |                                     | 17     | at that moment. Answer that question, and then you can  |
| 18     |                                     | 18     | take a break.   |
| 19     |                                     | 19     | MR. WILSON: Just trying to think.                       |
| 20     |                                     | 20     | Anything else you want to add?                          |
| 21     |                                     | 21     | MR. MAGUIRE: If it comes up, we'll                      |
| 22     |                                     | 22     | address it.   |
| 23     |                                     | 23     | MR. WILSON: Okay. Yeah. Not a                           |
| 24     |                                     | 24     | problem. Give me one second.                            |

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|        |  |        |   |
|--------|--|--------|---|
| Page 6 | <p>1 BY MR. WILSON:</p> <p>2 Q. We have your full name on the record. What's your</p> <p>3 educational background?</p> <p>4 A. Bachelor of Science, Administration of Criminal</p> <p>5 Justice.</p> <p>6 Q. Where is that? From the Philadelphia area or?</p> <p>7 A. Number of schools. Indiana University, Temple.</p> <p>8 And I finished that University of Phoenix online.</p> <p>9 Q. Okay. Your BA is from the University of Phoenix?</p> <p>10 A. Yes.</p> <p>11 Q. That's the other thing. I just remembered</p> <p>12 something else. Let's try to make sure we don't talk</p> <p>13 over each other. I will try.</p> <p>14 What that means is, I have to put my question on</p> <p>15 the record first; and then, you can answer however you</p> <p>16 want to. And I will also make sure that when you are</p> <p>17 speaking, I will try not to interrupt you, okay?</p> <p>18 Other than the University of Phoenix, the BA from</p> <p>19 the University of Phoenix, do you have any other</p> <p>20 advanced degrees?</p> <p>21 A. No.</p> <p>22 Q. Did you receive -- after you graduated from the</p> <p>23 University of Phoenix with your BA from the University</p> <p>24 of Phoenix, what did you do next?</p> | Page 8 | <p>1 BY MR. WILSON:</p> <p>2 Q. Yeah. I was going to say. There is a bunch of</p> <p>3 prisons on State Road. House of Corrections.</p> <p>4 And what did you do at the House of Correction?</p> <p>5 A. I was initially a correctional officer with the</p> <p>6 female population.</p> <p>7 Q. They have female population at the House of</p> <p>8 Correction and not at Riverside?</p> <p>9 A. Originally, it was at the House of Correction in</p> <p>10 1983.</p> <p>11 Q. Because they had not built Riverside?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. You worked in the House of Correction in the</p> <p>14 female side in 1983. And you worked there how long?</p> <p>15 A. I really don't know. From the House of Correction</p> <p>16 then we built the modulars for the females, maybe 1985.</p> <p>17 And we still had the House of Correction for the</p> <p>18 females. So in between the two buildings I worked.</p> <p>19 Q. Was that as a -- also during that time period, that</p> <p>20 was as a correctional officer?</p> <p>21 A. Correct.</p> <p>22 Q. What kind of training did you have as a</p> <p>23 correctional officer before you worked at, in 1983 at</p> <p>24 the House of Correction and at the modulars?</p>   |
| Page 7 | <p>1 A. Continued to work, took different courses</p> <p>2 through -- job-related courses.</p> <p>3 Q. What kind of job-related courses?</p> <p>4 A. Things like interpersonal communication skills,</p> <p>5 managerial skills, training, things of that nature.</p> <p>6 Q. Okay. When did you begin work in the correctional</p> <p>7 facility field?</p> <p>8 A. September 1983.</p> <p>9 Q. Okay. And when did you graduate from University of</p> <p>10 Phoenix?</p> <p>11 A. I believe it was 2011.</p> <p>12 Q. Okay. So, you started working in the correctional</p> <p>13 field first before you got your BA?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So, when did you start working -- you said</p> <p>16 1983?</p> <p>17 A. Correct.</p> <p>18 Q. Okay.</p> <p>19 Where were you working?</p> <p>20 MR. MAGUIRE: You look great, by the</p> <p>21 way.</p> <p>22 (Group laughter.)</p> <p>23 THE WITNESS: On State Road. I</p> <p>24 originally started at the House of Correction.</p>   | Page 9 | <p>1 A. When you are hired, you go through training through</p> <p>2 the training academy, a 12-week training course at the</p> <p>3 training academy. And they teach you rules,</p> <p>4 regulations, general orders, how to work in that</p> <p>5 environment, things of that nature, first aid,</p> <p>6 self-defense classes.</p> <p>7 Q. Right.</p> <p>8 A. Numerous things.</p> <p>9 Q. Did they teach you anything about how to deal with</p> <p>10 prisoners who may be suicidal in your training as a</p> <p>11 correctional officer?</p> <p>12 A. So, let me think back to 1983 in my training. I</p> <p>13 really can't recall if it was labeled suicide training,</p> <p>14 suicide prevention. Just taught us about inmate</p> <p>15 behaviors. And in particular, I really can't say what</p> <p>16 type of inmate behaviors. But I just remember learning</p> <p>17 about inmate behaviors. I can't tell you what it is</p> <p>18 that I really learned in 1983.</p> <p>19 Q. Okay. After -- you worked in that situation from</p> <p>20 '83 to about '85, am I correct or incorrect?</p> <p>21 A. I'm really not sure when I promoted to Sergeant. I</p> <p>22 really can't tell you.</p> <p>23 Q. Okay. You're promoted to Sergeant some time later.</p> <p>24 And what are your duties as Sergeant?</p> |

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| Page 10  | Page 12   |
|--|---|
| <p>1 A. As the Sergeant, it was my responsibility to<br/>2 oversee correctional -- correctional officers are a<br/>3 direct line staff. Everything --<br/>4 Q. What does that mean?<br/>5 A. The correctional officers are the first staff that<br/>6 interact with the inmate population.<br/>7 Q. Okay.<br/>8 A. As a correctional Sergeant, it was my<br/>9 responsibility to supervise those officers that are<br/>10 interacting directly with the inmate population.<br/>11 Q. Is that set up what's being done even now on State<br/>12 Road with the prisons on State Road?<br/>13 A. Yes. Correctional officers are the first line.<br/>14 Q. And for the record, was that set up the same as it<br/>15 was in 2016 when Gene Wilson was housed at the House of<br/>16 Correction?<br/>17 A. Define "set up the same way"? I'm confused on what<br/>18 do you mean by that.<br/>19 Q. Well, you just testified you said the Sergeants<br/>20 basically supervise the correctional officers in the<br/>21 day-to-day interactions with the prisoners.<br/>22 Is that the -- did I rephrase it the right way?<br/>23 A. Yes.<br/>24 Q. My point -- excuse me.</p> | <p>1 and CFCF as a Lieutenant?<br/>2 A. I'm not sure the years.<br/>3 Q. Several years?<br/>4 A. Several years.<br/>5 Q. Okay. And what did your job entail as a Lieutenant<br/>6 now as opposed to a Sergeant?<br/>7 A. As the Lieutenant, Lieutenant's position is<br/>8 managerial at that point. We supervise Sergeants who,<br/>9 in turn, are direct supervision for the inmate<br/>10 population.<br/>11 Q. Okay. And what was your next step after that,<br/>12 after becoming a Lieutenant?<br/>13 A. Correctional Captain.<br/>14 Q. Okay. And how long were you a Correctional Captain<br/>15 until you received another promotion?<br/>16 A. I was Captain for about, maybe, seven years.<br/>17 Q. Before we -- okay. As a Lieutenant, did you<br/>18 receive any special training?<br/>19 A. Yes. As Lieutenant, it was more administrative<br/>20 work, more paperwork involved in reference to<br/>21 correctional staff submitting paperwork. It went<br/>22 through the Sergeant and from the Sergeant to the<br/>23 Lieutenant. We dealt with commitments.<br/>24 Q. What kind of commitments?</p>   |
| Page 11  | Page 13   |
| <p>1 My question was, is that set up, what you just<br/>2 testified to, is that the way it was in 2016, say, at<br/>3 the House of Correction?<br/>4 A. Yes.<br/>5 Q. Okay. All right. And how long are you a Sergeant<br/>6 before you were promoted?<br/>7 A. I think I was promoted to Lieutenant in 1991. I'm<br/>8 not really sure.<br/>9 Q. Okay.<br/>10 A. Because I was out of work for couple years, so I<br/>11 really don't remember when my actual promotion<br/>12 occurred.<br/>13 Q. It occurred, and you became a Lieutenant. Did<br/>14 you -- where were you working as a Lieutenant?<br/>15 Was it focused on one -- strike the question.<br/>16 Was -- when you became a Lieutenant, was your work<br/>17 focused on one particular prison, or doing work with<br/>18 all the prisons up in State Road?<br/>19 A. I know as a Sergeant I worked at the Detention<br/>20 Center, Holmesburg. Got promoted to Lieutenant. I<br/>21 believe I went back to the House of Correction, CFCF.<br/>22 So, I was at House of Correction and CFCF as a<br/>23 Lieutenant.<br/>24 Q. And how long were you at the House of Correction</p>                       | <p>1 A. Lieutenants deal with inmate misconducts.<br/>2 Officers -- an officer can submit an inmate misconduct.<br/>3 Sergeant verifies the conduct. And then the Lieutenant<br/>4 reviews it and determines what level this misconduct<br/>5 may be.<br/>6 Q. Do you have a formal hearing for that?<br/>7 A. Yes.<br/>8 Q. Or is it just you review paperwork, and then make a<br/>9 determination?<br/>10 A. Well, dealing with an inmate misconduct, the<br/>11 Lieutenant can have an informal hearing if it is a<br/>12 minor charge towards the inmate misconduct. Then that<br/>13 Lieutenant has an informal hearing.<br/>14 Q. Right.<br/>15 A. If not, the Lieutenant still reviews it. And the<br/>16 Lieutenant decides if this inmate misconduct should be<br/>17 produced to the Disciplinary Hearing Officer, DHO, to<br/>18 determine guilt or innocence.<br/>19 Q. Right. What other -- what, if any, other kind of<br/>20 training did you have as a Lieutenant?<br/>21 A. Again, interpersonal communication skills,<br/>22 administrative training, how to submit paperwork, how<br/>23 to complete paperwork, how to deal with staff issues<br/>24 and inmate issues.</p> |

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|---|---|
| <p>1 Q. Okay. And after Lieutenant, what did you become?<br/>2 A. Correctional Captain.<br/>3 Q. Okay. And did you have any specialized training<br/>4 when you became or prior to becoming Correctional<br/>5 Captain?<br/>6 A. Yes. I had NIC training.<br/>7 Q. What is that?<br/>8 A. National Institute of Corrections.<br/>9 Q. You had to go somewhere to receive that training?<br/>10 A. Yes.<br/>11 Q. Where did you have to go?<br/>12 A. I believe I was in Denver, Colorado.<br/>13 Q. How long did that training last?<br/>14 A. About a week.<br/>15 Q. What did that training entail?<br/>16 A. Can I go back?<br/>17 You said something about you had to go away to<br/>18 training. I didn't have to go away to training. I<br/>19 requested to go away to training.<br/>20 Q. To Denver?<br/>21 A. Yes. It's a training that I felt that I wanted to<br/>22 pick up on.<br/>23 Q. So, you elected to go?<br/>24 A. Yes.</p>  | <p>1 Captain.<br/>2 Q. Okay.<br/>3 A. That consisted of assisting the Deputy Warden with<br/>4 administrative hearings, learning the DHO process. And<br/>5 basically, all the inmate needs fall under the<br/>6 Administrative Captains and Deputy Wardens.<br/>7 Q. What's the DHO process?<br/>8 A. Disciplinary Hearing Officer.<br/>9 Q. Okay.<br/>10 A. That's the process when an inmate is charged with<br/>11 an infraction.<br/>12 Q. Right.<br/>13 A. Or violate any of the rules of the institution.<br/>14 That he sits in front of formal hearing board, which is<br/>15 Disciplinary Hearing Officer. And the officer<br/>16 determines from the information given and the facts<br/>17 seen, the guilt or innocence of the inmate that's being<br/>18 charged.<br/>19 Q. Okay.<br/>20 A. And if it goes -- if guilt is noted, then there is<br/>21 a disposition that is put out through the DHO.<br/>22 Q. Okay. Then you moved up again?<br/>23 A. Yes.<br/>24 Q. To?</p>   |
| Page 15   | Page 17   |
| <p>1 Q. Okay.<br/>2 A. The training that is offered through PD -- PDP.<br/>3 Q. What is PDP?<br/>4 A. Philadelphia Department of Prisons.<br/>5 Q. Okay.<br/>6 A. Sorry.<br/>7 Q. That's all right.<br/>8 A. Acronyms. That training consisted of, again,<br/>9 managerial training to be supervising the Lieutenants,<br/>10 the Sergeants, line staff. As the Captain is more<br/>11 administrative and is operational and administrative<br/>12 work.<br/>13 I believe I was initially an Operational Captain.<br/>14 So, I just dealt with the basic operations of the<br/>15 institution. And then there was an Administrative<br/>16 Captain that dealt with inmate grievances, hearings,<br/>17 protective custody, things of that nature.<br/>18 Q. So, you didn't deal with that part of it. You<br/>19 dealt with the day-to-day administration?<br/>20 A. No, let me repeat.<br/>21 There is an Administrative Captain and an<br/>22 Operational. So most of my Captain tenure was<br/>23 operational. I did have a little bit of administration<br/>24 responsibilities when I worked with the females as a</p> | <p>1 A. Deputy Warden.<br/>2 Q. Okay. And on -- strike that.<br/>3 In 2016, you were Deputy Warden at the House of<br/>4 Correction; is that correct?<br/>5 A. No, that is not correct.<br/>6 Q. Okay.<br/>7 A. I was Deputy Warden at Alternative Special<br/>8 Detention Central Unit, acronym ASDCU. That is a<br/>9 institution for community, minimum inmates, work<br/>10 release inmates, things of that nature.<br/>11 Q. Can you describe a little bit better? Community --<br/>12 just describe what that entails. Like, what does that<br/>13 entail in relation to that job and your interaction<br/>14 with the prisoners given that particular job position?<br/>15 A. Okay. The inmates that are housed at ASDCU are<br/>16 classified either community, which are inmates that can<br/>17 go out and work in the community on grounds. Things of<br/>18 that nature.<br/>19 Then we have the work release inmates that go out,<br/>20 go to work every day and come back every evening or<br/>21 whatever their work hours are.<br/>22 And then we have minimum custody inmates that we<br/>23 allow to go to other institutions to clean and things<br/>24 of that nature.</p> |

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|--|--|
| <p>1 Q. Okay. And so essentially, you tell me if I'm right<br/>2 or wrong, you were supervising those three groups of<br/>3 inmates?<br/>4 A. I was supervising the Captain, the Lieutenant, the<br/>5 Sergeant.<br/>6 Q. Who supervise those inmates?<br/>7 A. Correct.<br/>8 Q. Okay. And how long did you have that job?<br/>9 A. I think I was there about three years.<br/>10 Q. Okay. And that was for all of the prisons up on<br/>11 State Road? It wasn't just like -- am I correct? It<br/>12 wasn't -- you were supervising all of the prisoners, I<br/>13 mean, strike that.<br/>14 In your capacity with that particular job, it<br/>15 didn't just relate to the House of Correction. It<br/>16 related to the other prisons that are located up on<br/>17 State Road; is that correct?<br/>18 A. It didn't relate to any prison except for<br/>19 Alternative Special Detention.<br/>20 Q. What is it called?<br/>21 A. ASDCU.<br/>22 Q. Okay.<br/>23 MR. MAGUIRE: Called ASD.<br/>24 MR. WILSON: Right. That's the one I</p> | <p>1 strike that.<br/>2 Is it safe to say that you were the supervisor<br/>3 of -- excuse me, the Deputy Warden of ASD in 2016,<br/>4 correct?<br/>5 A. Correct.<br/>6 Q. Okay. What kind of specialized, if any,<br/>7 specialized prison training did you receive in<br/>8 reference to suicide attempt procedures -- prison<br/>9 suicide attempt procedures?<br/>10 A. I never received training on -- say again,<br/>11 suicide --<br/>12 Q. Suicide attempt procedures.<br/>13 A. There was never any specialized training on suicide<br/>14 behaviors. We -- I believe when I worked at RCF,<br/>15 Riverside for the women.<br/>16 Q. Yes.<br/>17 A. We had a special unit -- maybe I need to go back.<br/>18 ASD is not an institution where we have special<br/>19 management housing. So if we have an inmate that is<br/>20 considered to be suicidal through mental health, then<br/>21 we transfer that inmate to an institution that handles<br/>22 special management housing.<br/>23 So when I was at RCF as a Captain, we had a<br/>24 specialized unit there. And at that unit, the staff</p>                                       |
| Page 19  | Page 21  |
| <p>1 think I heard.<br/>2 BY MR. WILSON:<br/>3 Q. You were focused just on ASD?<br/>4 A. Correct.<br/>5 Q. Okay. And that was your responsibility as Deputy<br/>6 Warden at that time?<br/>7 A. Yes.<br/>8 Q. Okay. How long did you have that particular<br/>9 responsibility before you moved onto other<br/>10 responsibilities?<br/>11 A. I was promoted to Warden in April, where we at,<br/>12 2018?<br/>13 Q. Yes.<br/>14 A. April 2018. Until April 2018, I was at ASD.<br/>15 Q. Do you remember when you became -- when you first<br/>16 took that job at ASD, the Deputy Warden at ASD? What<br/>17 year was that?<br/>18 A. I believe either 2014. I think it was, like,<br/>19 December 2014. I believe, 2015. I'm not really sure.<br/>20 Q. Okay. Until approximately April of 2018. Okay.<br/>21 In your capacity as a Deputy -- so you were the --<br/>22 for the record, you were Deputy Warden at ASD in charge<br/>23 of those particular units.<br/>24 When Gene Wilson in 2016 when Gene Wilson was --</p>             | <p>1 that worked that unit was showing a film about<br/>2 different disorders for the staff that work those<br/>3 units.<br/>4 Q. I'm not interested in the staff right now. I'm<br/>5 interested in you.<br/>6 Did you take a look at that film for example?<br/>7 A. No, I did not.<br/>8 Q. Okay. In reference to Gene Wilson, you are<br/>9 obviously aware that there was a suicide attempt that<br/>10 was unfortunately successful in 2016 relating to one<br/>11 prisoner named Gene Wilson at the House of Correction,<br/>12 correct?<br/>13 A. Correct.<br/>14 Q. Okay. Can you tell me how -- when did you first<br/>15 become aware of this prisoner named Gene Wilson?<br/>16 A. Gene Wilson was housed at ASD. I remember my<br/>17 Lieutenant contacting me. He wanted to place Gene --<br/>18 Q. Excuse me. Sorry to interrupt you. Can you please<br/>19 put the name of the Lieutenant that you spoke to on the<br/>20 record?<br/>21 A. I'm not sure. I believe it was Lieutenant Thomson.<br/>22 Q. Okay.<br/>23 A. It was a three-to-eleven shift. And he contacted<br/>24 me by phone to tell me that he had an inmate that</p> |

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1 wanted protective custody because he had been robbed on  
2 the street. He owned a barbershop or something, and he  
3 had been robbed previously on the street. And believed  
4 that the persons or person that robbed him were at ASD.  
5 However, he would not identify who the inmates  
6 were.  
7 Q. You are getting all of this, what you just  
8 testified to, was not from you. Was from Lieutenant  
9 Thomson?  
10 A. Yes, by phone.  
11 Q. Right.  
12 A. So, I told him that I wasn't comfortable with  
13 putting him in protective custody because any inmate  
14 can come up and say I want PC. And I might be putting  
15 him protective custody. And the people that he's  
16 frightened of can go right to protective custody, as  
17 well. And I told him, I said I want to place him at Ad  
18 Seg. I want to keep him safe.  
19 Q. You want to put him where?  
20 A. In Administrative Segregation. I'm sorry.  
21 Q. Yeah. We got -- okay. Administrative Segregation.  
22 A. I didn't want anyone to be able to hurt him.  
23 Q. Did you -- were -- strike that.  
24 Were you provided with any information, to the best

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1 of your recollection, from Lieutenant Thomson about  
2 these so-called people? Any information about the  
3 so-called people who may or may not want to hurt him?  
4 A. He just said that the inmate would not identify who  
5 they were, but they were at ASD.  
6 Q. Other than that, you had no information whatsoever  
7 about these individuals?  
8 A. No. I had no idea who they could be.  
9 Q. Okay. All right. So as a result of this  
10 conversation with -- did Lieutenant Thomson tell you  
11 anything else to the best of your recollection?  
12 A. I can't remember all that we discussed on the  
13 phone.  
14 Q. Did Lieutenant Thomson tell you that Mr. Wilson at  
15 the time you spoke to Mr. Wilson, was feeling stressed  
16 and had anxiety?  
17 Do you remember him telling you anything like that?  
18 A. He may have. I'm not sure or --  
19 Q. Sorry. I didn't -- I apologize for interrupting  
20 you. Is that your answer?  
21 A. Yes.  
22 Q. Okay. Or that Mr. Wilson had expressed illogical  
23 ideas or was afraid for no reason?  
24 A. I do not recall that.

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1 Q. Okay. Did Lieutenant Thomson also tell you, if you  
2 recall, whether or not he -- whether or not Mr. Wilson  
3 had told -- whether or not Mr. Wilson told him about  
4 threats that Lieutenant Thomson did not believe were  
5 real?  
6 A. I do not recall that.  
7 Q. Okay. Because there is paperwork -- there is some  
8 internal prison paperwork that indicates from other  
9 staff members that all the things that I just talked  
10 about were noted by other prison staff members. That  
11 he had -- he was anxious. He was nauseous, for  
12 example. He had threats that did not seem to be real  
13 either directly after, before or prior to the  
14 conversation that you had with Lieutenant Thomson.  
15 Were you aware of any of that?  
16 A. No.  
17 Q. Okay. So as a result of this conversation with  
18 Lieutenant Thomson, what, if anything, did you do next?  
19 A. I told him to place him into Administrative Seg,  
20 see if he can get cleared.  
21 Q. Where is Administrative Segregation located?  
22 A. At the House of Correction.  
23 Q. Okay. Why would -- why did you make the decision  
24 to house him at the House of Correction as opposed to

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1 somewhere else in the prison system?  
2 A. Because the House of Correction has special  
3 management housing and his custody level. Based on his  
4 custody level, he would go to the House of Correction  
5 for special management housing once he was clear.  
6 Q. What was his custody level if you recall?  
7 A. I really don't recall.  
8 Q. Okay. And you got to help me a little bit here.  
9 I'm not totally understanding. You wanted to send him  
10 to the House of Correction because they had a special  
11 unit that would -- that you felt would assist  
12 Mr. Wilson; is that correct?  
13 A. They had special management housing. They had  
14 Administrative Segregation housing at the House of  
15 Correction for his custody level when --  
16 MR. MAGUIRE: I don't mean to step on --  
17 is -- when you say special management, does that  
18 include Protective Custody, Administrative  
19 Segregation and Punitive Segregation?  
20 THE WITNESS: Yes. Yes.  
21 BY MR. WILSON:  
22 Q. So, you thought it would benefit, obviously,  
23 Mr. Wilson going to the House of Correction --  
24 A. Yeah.

7 (Pages 22 to 25)

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|--|--|
| <p>1 Q. -- for what you just stated?</p> <p>2 Isn't it true that Lieutenant Thomson also told you</p> <p>3 that Mr. Wilson had stated earlier to someone that he</p> <p>4 wanted to either harm himself or harm others?</p> <p>5 A. I'm not really sure.</p> <p>6 Q. Okay. Give me one second, ma'am. We have</p> <p>7 procedure to go through.</p> <p>8 MR. WILSON: She is going to mark this.</p> <p>9 (At this time, Exhibit Wilson-1 was</p> <p>10 marked for identification.)</p> <p>11 MR. WILSON: For the record, the witness</p> <p>12 is taking a look at what's been previously</p> <p>13 marked as Wilson-1. And counsel for the</p> <p>14 plaintiff has shown this document to counsel for</p> <p>15 the defendants. Who did, in discovery,</p> <p>16 previously provide this particular document to</p> <p>17 plaintiff's counsel.</p> <p>18 THE WITNESS: Okay.</p> <p>19 BY MR. WILSON:</p> <p>20 Q. You have had an opportunity to take a look at</p> <p>21 what's been marked as Wilson-1, correct, ma'am?</p> <p>22 A. Correct.</p> <p>23 Q. There is a signature here approximately on the</p> <p>24 right -- upper, right side of this particular document.</p> | <p>1 MR. MAGUIRE: Thank you.</p> <p>2 MR. WILSON: Give me one moment, ma'am.</p> <p>3 I'll be right with you.</p> <p>4 BY MR. WILSON:</p> <p>5 Q. After you having read -- is it -- strike that.</p> <p>6 Today, is it Warden or Deputy Warden now?</p> <p>7 A. Warden.</p> <p>8 Q. Okay. I am going to get to that in a second. I</p> <p>9 want to make sure that I give you your proper respect.</p> <p>10 So, Warden, after reading Wilson-1, you said it</p> <p>11 refreshes your recollection. And isn't it true in your</p> <p>12 statement, you admitted that you were told that</p> <p>13 Mr. Wilson wanted to either -- he was either going to</p> <p>14 get hurt or he was going to harm someone else.</p> <p>15 Does that refresh your recollection?</p> <p>16 A. That's what my memo says, yes.</p> <p>17 Q. And based in part on that or in spite of that,</p> <p>18 depending on what your perspective is, you instructed</p> <p>19 Lieutenant Thomson to place Mr. Wilson into</p> <p>20 administrative placement because he would hurt himself</p> <p>21 or hurt someone else; is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. By the way, that document in Wilson-1 down at --</p> <p>24 direct your attention down at the bottom, there are</p> |
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| <p>1 Can you tell me if that's your signature?</p> <p>2 A. That is my signature.</p> <p>3 Q. Just generally, can you tell me what this</p> <p>4 particular Wilson-1 document is on the record?</p> <p>5 A. This is a memorandum from myself to Lieutenant</p> <p>6 Murray explaining the conversation that I had with</p> <p>7 Lieutenant Thomson in reference to Inmate Wilson being</p> <p>8 placed in Administrative Segregation.</p> <p>9 Q. That conversation took place on or about March 25,</p> <p>10 2016; is that correct?</p> <p>11 A. Correct.</p> <p>12 Q. You need to take a look at it again?</p> <p>13 A. No, I'm fine.</p> <p>14 Q. For the record, did you have an opportunity to read</p> <p>15 this document?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Does your reading of this document refresh</p> <p>18 your recollection about some additional facts that we</p> <p>19 may have previously discussed?</p> <p>20 A. Somewhat, yes.</p> <p>21 Q. Okay. According to this -- give me one second,</p> <p>22 please?</p> <p>23 MR. MAGUIRE: Do you have copies?</p> <p>24 MR. WILSON: I have one. Here it is.</p>  | <p>1 words that are underlined.</p> <p>2 Did you underline those words?</p> <p>3 A. I must have. It's my memo.</p> <p>4 Q. I don't know. This is part of what a deposition</p> <p>5 is.</p> <p>6 A. Yeah.</p> <p>7 Q. And the words that are underlined, can you read</p> <p>8 them on the record please that you underlined?</p> <p>9 A. Would hurt himself or someone else.</p> <p>10 Q. Uh-huh. And you had made this decision, you said,</p> <p>11 based on the specs of administrative placement,</p> <p>12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. What were the specs of administrative placement</p> <p>15 that you relied on in making this particular decision?</p> <p>16 A. The inmate in the judgment of staff may, for any</p> <p>17 reason, pose a threat to himself, herself, others or</p> <p>18 the security of the facility.</p> <p>19 Q. Is there -- are there particular or specific rules</p> <p>20 and regulations that you relied on by number, for</p> <p>21 example, in making this determination of placing</p> <p>22 Mr. Wilson where you did?</p> <p>23 Do you understand the question?</p> <p>24 A. No, I don't.</p>  |

8 (Pages 26 to 29)

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|---|--|
| <p>1 Q. Okay. Okay.</p> <p>2 You wrote down that you relied on the words: "The</p> <p>3 inmate and the judgment of staff may, for any reason,</p> <p>4 pose a threat to himself, herself, others or the</p> <p>5 security of the facility." I understand that's what</p> <p>6 you wrote. It says what it says. I got you. No</p> <p>7 problem with that.</p> <p>8 What I am trying to find out is, if you recall,</p> <p>9 what if any specific -- where did this wording come</p> <p>10 from? Which particular internal prison rule or</p> <p>11 regulation did this wording come from to the best of</p> <p>12 your recollection?</p> <p>13 A. It's from the policy for Administrative</p> <p>14 Segregation. The definition of what is -- it's part of</p> <p>15 the definition for Administrative Segregation</p> <p>16 Placement.</p> <p>17 Q. Okay. Do you recall the specific rule number or</p> <p>18 regulation number?</p> <p>19 A. No, I don't.</p> <p>20 Q. Okay. Have you ever done depositions before?</p> <p>21 A. Yes, I have.</p> <p>22 Q. When was the last dep -- time that you performed a</p> <p>23 deposition?</p> <p>24 A. Maybe about four, five months ago.</p>  | <p>1 And I could have ended up placing the person that he</p> <p>2 feared the most in protective custody along with him.</p> <p>3 Therefore, in Administrative Segregation, there is</p> <p>4 less possibility of someone being able to hurt him in</p> <p>5 Administrative Seg. Whereas in protective custody, the</p> <p>6 opportunity would be there.</p> <p>7 Q. Did that determination that you just talked about</p> <p>8 or testified about, did you take it into consideration</p> <p>9 as well what you stated in your report that he -- you</p> <p>10 now had information that Mr. Wilson wanted to either</p> <p>11 harm himself or harm others?</p> <p>12 Was that factored into your determination or into</p> <p>13 your decision to place this person into, essentially,</p> <p>14 solitary confinement?</p> <p>15 A. He wasn't being placed into solitary confinement.</p> <p>16 Q. I'll rephrase.</p> <p>17 Did that factor into your decision to place this</p> <p>18 person into Administrative Placement at the House of</p> <p>19 Correction?</p> <p>20 A. The fact that when the Lieutenant told me that</p> <p>21 Mr. Wilson, I guess, wanted to -- he may hurt</p> <p>22 himself -- he may hurt someone else or himself, to</p> <p>23 place him into Administrative Segregation was my</p> <p>24 decision because I know he would see Mental Health.</p> |
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| <p>1 Q. Was it in reference to a -- well, strike that.</p> <p>2 In reference to your experience in doing</p> <p>3 depositions, had you ever done depositions regarding</p> <p>4 this kind of a case, a prison suicide kind of case?</p> <p>5 A. Never prison suicide.</p> <p>6 Q. Okay. Are your depositions that were done in the</p> <p>7 past usually about what a prison correctional officer</p> <p>8 saw and things of that nature?</p> <p>9 A. Correct.</p> <p>10 Q. Other than this particular rule that you stated in</p> <p>11 your memorandum in reference to the attempted suicide</p> <p>12 and subsequent death of Mr. Wilson, did you rely on any</p> <p>13 other rules of -- prison rules and regulations in</p> <p>14 making your determination that, hey, I'm going to put</p> <p>15 this person in administrative placement at the House of</p> <p>16 Correction?</p> <p>17 A. Yes, I did.</p> <p>18 Q. Which one?</p> <p>19 A. Because he -- the protective custody that was asked</p> <p>20 about by the Lieutenant, I didn't feel that I would be</p> <p>21 able to keep away anyone that was trying to harm him if</p> <p>22 I placed him in protective custody.</p> <p>23 As I said before, anyone can come up and say I feel</p> <p>24 threatened. Inmate AB is threatening me. I want PC.</p> | <p>1 Mental Health has the last determining factor on</p> <p>2 whether a person goes into special management housing.</p> <p>3 They determine if they are fit for the segregation.</p> <p>4 I recommended it. And once they are interviewed by</p> <p>5 mental health and medical, then that determination is</p> <p>6 either agreed upon or not agreed upon.</p> <p>7 Q. Okay. One second. Because you said he "may have".</p> <p>8 You understand the word -- you used the word "may."</p> <p>9 You are an intelligent woman. You said the word</p> <p>10 may. He may have wanted to harm himself or others.</p> <p>11 That means that there was only -- I got to put my</p> <p>12 question on the record. That means there was only the</p> <p>13 possibility.</p> <p>14 Did you use the word "may" in your statement in</p> <p>15 Wilson-1?</p> <p>16 A. No, I did not.</p> <p>17 Q. You used the word -- I am going to quote from you.</p> <p>18 "He" -- meaning Mr. Wilson -- "would hurt himself or</p> <p>19 someone else."</p> <p>20 Is that -- are those the words you put in your</p> <p>21 report?</p> <p>22 A. Yes.</p> <p>23 Q. Just for the record.</p> <p>24 A. Yes.</p>   |

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|---|--|
| <p>1 Q. Right. So in your report, it said he would hurt<br/>2 himself or someone else. Not he "may" hurt himself or<br/>3 someone else, correct?<br/>4 A. Correct.<br/>5 Q. Is it safe to say then, that based on your<br/>6 recollection of this report, based on your conversation<br/>7 with Lieutenant Thomson, you believed at that moment<br/>8 prior -- directly prior to placing Mr. Wilson in<br/>9 Administrative Placement at the House of Corrections,<br/>10 that he would hurt himself or someone else because<br/>11 that's what you were told by Lieutenant Thomson,<br/>12 correct?<br/>13 A. No, that's not correct. What I believed is that<br/>14 when Lieutenant Thomson told me what he told me, I<br/>15 thought about the Administrative Segregation Placement<br/>16 Directive. And because it said that he -- if I believe<br/>17 that someone may for any reason, I base it on that,<br/>18 that he may. Because if he had did say he would,<br/>19 doesn't mean he will. He may. And I based it on that<br/>20 fact.<br/>21 Q. Right. But you -- just for the record, these are<br/>22 the words that you chose to put into your report,<br/>23 correct?<br/>24 A. Correct.</p> | <p>1 interview with Mr. Wilson done prior to him being<br/>2 placed in -- on D Block in Administrative Placement?<br/>3 A. Had to be done, correct. Yes.<br/>4 Q. I'm not asking -- that's a different question.<br/>5 You're saying it had to be done. I understand that.<br/>6 To the best of your independent recollection, was<br/>7 it done?<br/>8 A. I don't get to see -- I didn't get to see that<br/>9 paperwork.<br/>10 Q. Okay. Generally, you can talk to me -- you can't<br/>11 talk to me about that specifically in relation to<br/>12 Mr. Wilson because you don't really know. You are<br/>13 saying under the rules and regulations, that's what was<br/>14 supposed to have been done, correct?<br/>15 A. Correct.<br/>16 Q. Okay. So, how does it work? Just take me through<br/>17 it.<br/>18 So, you make the order, hey, we want to put him in<br/>19 Administrative Placement. Do you then contact the<br/>20 Mental Health Unit? Or do you have someone else, hey,<br/>21 okay, I made me decision. Do you have someone else<br/>22 contact the Mental Health Unit?<br/>23 A. Normally, once the Lieutenant makes the decision,<br/>24 it's normal -- the Lieutenant processes the paperwork.</p> |
| Page 35   | Page 37  |
| <p>1 Q. No one told you to put these particular words into<br/>2 the report, correct?<br/>3 A. Correct.<br/>4 Q. Would you agree with me that using a word someone<br/>5 "may" do something and someone "would" do something are<br/>6 two different actions.<br/>7 Isn't that correct?<br/>8 A. Correct.<br/>9 Q. Okay. Now, you testified that you were going to<br/>10 put him in administrative -- you gave your reasons.<br/>11 You put him in administrative protection. And then you<br/>12 said, essentially, Mental Health would get involved and<br/>13 then make a determination as to Mr. Wilson's mental<br/>14 health.<br/>15 Is that what your understanding was?<br/>16 A. Okay. Yeah, I did say put him into Administrative<br/>17 Segregation placement.<br/>18 Q. Right.<br/>19 A. Once anyone is referred for any kind of special<br/>20 housing management placement, they have to be<br/>21 interviewed and approved through Mental Health and<br/>22 Medical before they can be placed into that<br/>23 Segregation.<br/>24 Q. And to the best of your recollection, was that</p>  | <p>1 And sends the inmate to Mental Health to be<br/>2 interviewed, sends the inmate to Medical to be<br/>3 interviewed. And at that point, once he's okay'd by<br/>4 Mental Health and Medical to be placed in special<br/>5 management, he's transported to the Special Housing<br/>6 Management Area.<br/>7 Q. You said the Lieutenant makes the decision. Didn't<br/>8 you make the decision for placement and not the<br/>9 Lieutenant?<br/>10 A. I said normally the Lieutenant.<br/>11 Q. Right.<br/>12 A. The Lieutenant called me.<br/>13 Q. Right.<br/>14 A. I told him to place him into Administrative<br/>15 Segregation. At that point, I'm out of it. I don't --<br/>16 anything else behind me telling him to place him into<br/>17 Administrative Segregation, I don't -- I'm not privy to<br/>18 seeing. I'm not aware of. I don't know who seen him<br/>19 in Mental Health, who seen him in Medical.<br/>20 The Lieutenant takes over that process.<br/>21 Q. Okay. Right. Just so we're clear, I understand<br/>22 what you just said this.<br/>23 In this particular situation as relates to<br/>24 Mr. Wilson, you were the one who took the</p>  |

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| <p>1 responsibility for making the ultimate decision to say<br/>2 I'm going to place Gene Wilson in Administrative<br/>3 Placement, correct?<br/>4 That's what it seems to say in your memo.<br/>5 A. The way you are saying it -- okay, the Lieutenant<br/>6 contacted me.<br/>7 Q. Yes.<br/>8 A. I told the Lieutenant, place him in Administrative<br/>9 Segregation. At that point, the Lieutenant followed<br/>10 the necessary steps and procedures to have him placed<br/>11 into Administrative Segregation.<br/>12 Q. Well, you believe he did because you just testified<br/>13 you're not sure what happened after you made the<br/>14 decision to instruct Lieutenant Thomson to place him<br/>15 into Administrative Placement.<br/>16 Correct or incorrect?<br/>17 A. Well, he would not have been accepted into the<br/>18 Administrative Segregation housing area had the<br/>19 paperwork not been completed according to policy.<br/>20 Q. Okay. According to -- but you have no personal<br/>21 knowledge because you just testified to that. Okay.<br/>22 But according to the general rules and regulations,<br/>23 once that interview is done, I'm assuming -- you tell<br/>24 me if I'm right or wrong as the then Deputy Warden --</p> | <p>1 inmates.<br/>2 Q. I am going to ask you about that in a second. You<br/>3 said there a -- is there a physical structure to put<br/>4 those particular types of prisoners is what I am asking<br/>5 first?<br/>6 A. Repeat the question.<br/>7 Q. Sure. Okay. If prison officials make a<br/>8 determination that someone has mental health -- a<br/>9 prisoner, excuse me, obviously has mental health<br/>10 problem and/or some suicidal problem or ideation, is<br/>11 there a particular unit up on State Road in one of the<br/>12 prisons where those kinds of prisoners are then<br/>13 physically taken to?<br/>14 A. If I may. You said prison administration. Prison<br/>15 administration doesn't decide if a person has mental<br/>16 health issues. That's a decision that is made by the<br/>17 doctors if a person is having mental health issues. If<br/>18 they do determine that a person has mental health<br/>19 issues that are so severe, they require -- we do have a<br/>20 mental health wing at our Philadelphia Prison Health<br/>21 Service Wing. It's dedicated to mental health issues.<br/>22 Q. Where is that wing physically located in reference<br/>23 to, say, the House of Correction or ASD?<br/>24 A. It's in the Detention Center.</p> |
| Page 39   | Page 41   |
| <p>1 that there is paperwork that's generated as a result of<br/>2 this interview with the prisoner?<br/>3 A. Which interview are we referring to?<br/>4 Q. The one Mental Health talks to, for example, a<br/>5 prisoner that you have determined needs to be placed in<br/>6 Administrative Placement.<br/>7 A. Yes.<br/>8 Q. Okay. And if a determination -- okay.<br/>9 Then the decision is ultimately made to place this<br/>10 particular prisoner into Administrative Placement,<br/>11 correct?<br/>12 A. Correct.<br/>13 Q. If a prisoner is determined by someone in the<br/>14 prison to have mental health issue or some suicidal<br/>15 issue or something like that, does ASD or House of<br/>16 Correction have or some other prison on State Road, is<br/>17 there a dedicated Mental Health Unit to deal with<br/>18 prisoners who may have these issues?<br/>19 A. Yes.<br/>20 Q. Where would that unit be located?<br/>21 A. Well, they have a mobile doctor that goes from<br/>22 institution to institution as required. Meanwhile,<br/>23 they have a social -- mental health social worker<br/>24 that's on duty at the institutions to interview the</p>   | <p>1 Q. It's in the DC?<br/>2 A. Yes.<br/>3 Q. I know some acronyms, too.<br/>4 A. Yes. It's in the Detention Center.<br/>5 Q. Okay. Now to the best of your worker, was<br/>6 Mr. Wilson -- excuse me, to the best of your<br/>7 recollection, was Mr. Wilson seen by any sort of mobile<br/>8 doctor?<br/>9 A. To the best of my recollection or to the best of<br/>10 what is supposed to be done?<br/>11 Q. Uh-uh.<br/>12 A. To the best of my recollection, again, yes. He<br/>13 would have been seen, yes.<br/>14 Q. I'm not asking about would have been seen. I'm<br/>15 asking if you have independent recollection that he --<br/>16 in this particular case, Mr. Wilson was seen by, say, a<br/>17 mobile doctor?<br/>18 A. No. I don't have any recollection.<br/>19 Q. Okay. Other than that conversation with Lieutenant<br/>20 Thomson, did you have a conversation with anyone else<br/>21 in reference to Mr. Gene Wilson?<br/>22 A. No.<br/>23 Q. Okay. And just so I'm clear, why was the decision<br/>24 made to transfer Mr. Wilson to -- from ASD to</p>   |

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|---|---|
| <p>1 administrative placement in D Block as opposed to the<br/>2 unit in the DC that you discussed?<br/>3 A. Because special management housing --<br/>4 MR. MAGUIRE: Hold on. Are you<br/>5 asking about why he was sent to HOC as opposed<br/>6 to the health service wing in DC?<br/>7 MR. WILSON: Yeah. That's basically<br/>8 what I'm saying. Because I'm just saying, he<br/>9 was at ASD. The decision was made to put him in<br/>10 D Block at the House of Correction. But there<br/>11 was another unit at the DC.<br/>12 MR. MAGUIRE: Okay. I'm going to object<br/>13 to the form because it presupposes that she was<br/>14 the one who made that determination.<br/>15 But you may answer.<br/>16 THE WITNESS: Okay.<br/>17 I made the decision to have him placed<br/>18 in Administrative Segregation placement. Which<br/>19 for the inmates housed at ASD, that placement is<br/>20 at the House of Correction.<br/>21 Once the inmate -- that determination<br/>22 was made for him to be placed in Administrative<br/>23 Segregation, he was interviewed by Mental Health<br/>24 who said that he was --</p> | <p>1 ideas.<br/>2 MR. MAGUIRE: I just want to object.<br/>3 MR. WILSON: This is a hypothetical.<br/>4 MR. MAGUIRE: Okay.<br/>5 MR. WILSON: I'll --<br/>6 MR. MAGUIRE: In this hypothetical, the<br/>7 Lieutenant is communicating all of these things<br/>8 that you are saying now?<br/>9 MR. WILSON: Yeah.<br/>10 MR. MAGUIRE: Okay.<br/>11 BY MR. WILSON:<br/>12 Q. Okay. And that this particular inmate is afraid<br/>13 for no reason and told prison staff of physical threats<br/>14 that were deemed to be unreal. If you had all of that<br/>15 information from a Lieutenant, would you still have<br/>16 made the same determination to place that particular<br/>17 inmate into D Block in Administrative Placement?<br/>18 A. Inmate, no. The inmate would have been referred.<br/>19 Q. When you said -- just for the record, you have to<br/>20 say referred to where?<br/>21 A. An emergency referral would have been generated in<br/>22 the computer. What that is, is it gives you all<br/>23 different synopsis of complaints or inmate behavior.<br/>24 And each one you click determines the level of mental</p>   |
| Page 43   | Page 45   |
| <p>1 BY MR. WILSON:<br/>2 Q. Well, you believe he should have been interviewed<br/>3 by Mental Health because you don't have --<br/>4 A. Right.<br/>5 Q. On the record, we have to be clear. You don't have<br/>6 a personal recollection that he was or not, correct?<br/>7 A. I recommended that the inmate be placed in<br/>8 Administrative Segregation.<br/>9 Q. Okay.<br/>10 Just generally based on your training and your<br/>11 experience, which -- yeah, your training and<br/>12 experience, if you have an inmate, you get -- strike<br/>13 that.<br/>14 Based on your training and experience, if you have<br/>15 a Lieutenant calling you and says, hey, I got an<br/>16 inmate. He wants to -- he said he would hurt himself<br/>17 or he would hurt someone else.<br/>18 You follow me so far?<br/>19 A. Correct.<br/>20 Q. He also said that this inmate is showing anxiety.<br/>21 Follow me so far?<br/>22 A. I'm following you.<br/>23 Q. Okay. The inmate is nauseous and is throwing up.<br/>24 The inmate is -- let's see, has expressed illogical</p>  | <p>1 healthcare.<br/>2 So in other words, if he say I want to hurt myself,<br/>3 you click off the box. It will come up and go to<br/>4 mental health for the inmate to be seen either<br/>5 emergent, routine, expressed, whatever.<br/>6 The inmate would be seen in Mental Health.<br/>7 Q. Okay. But as a -- the then Deputy Warden, your<br/>8 decision then would not have been to place that<br/>9 particular inmate given what you were told by the<br/>10 Lieutenant that I just listed. You would not place<br/>11 that same person in Administrative Placement, or would<br/>12 you have made the decision, no, I got to send this<br/>13 particular inmate exhibiting these things that my<br/>14 Lieutenant is telling me about, I would put him<br/>15 somewhere else?<br/>16 You understand the question?<br/>17 A. I understand the question.<br/>18 Q. Okay.<br/>19 A. So hypothetically --<br/>20 Q. Yes.<br/>21 A. -- if I wanted to place that inmate into<br/>22 Administrative Segregation --<br/>23 Q. No. No. I'm asking what would you have done,<br/>24 hypothetically given those particular factors, if a</p> |

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|--|---|
| <p>1 Lieutenant had told you those particular factors?<br/>2 MR. MAGUIRE: Object to the form.<br/>3 You can answer.<br/>4 THE WITNESS: The Lieutenant --<br/>5 hypothetically, the Lieutenant wouldn't call me<br/>6 to tell me about an inmate with these issues.<br/>7 The Lieutenant would have done the emergency<br/>8 referral. That's nothing he would contact me<br/>9 for. It's a procedure for that.<br/>10 If the inmate was displaying behavior or<br/>11 ideologies and different behaviors, the<br/>12 Lieutenant has procedure to follow. That's not<br/>13 a decision for me to make for inmate to go to<br/>14 Mental Health.<br/>15 BY MR. WILSON:<br/>16 Q. You just made a decision on Gene Wilson based on --<br/>17 let me finish my question. You can answer however you<br/>18 like.<br/>19 You just made a decision based on your memorandum<br/>20 here, Wilson-1, on one particular prisoner, to place<br/>21 that prisoner for some reason you stated here into<br/>22 Administrative Placement at the House of Correction,<br/>23 correct? And that was based in large part on<br/>24 information that you received from Lieutenant Thomson.</p>  | <p>1 have had him sent over to be an evaluation to<br/>2 have an emergency referral put on him prior to<br/>3 that to be sure that he could handle<br/>4 Administrative Segregation.<br/>5 BY MR. WILSON:<br/>6 Q. Give me one second. I'm just going over some of my<br/>7 notes.<br/>8 Now if you have generally, based on your<br/>9 experience -- you need to take a break? You good?<br/>10 A. No, I'm fine.<br/>11 Q. In your experience as Deputy Warden 2016, prisoners<br/>12 who were deemed to want to harm themselves or harm<br/>13 others, they are generally -- I understand they are<br/>14 given a mental health -- you are saying general rules,<br/>15 they are given mental health evaluation.<br/>16 Are they then, depending on the evaluation, placed<br/>17 in a mental health unit of some sort?<br/>18 MR. MAGUIRE: Object to the form.<br/>19 You can answer.<br/>20 THE WITNESS: Once the inmate -- the<br/>21 commitment goes over for the inmate to be placed<br/>22 in special management housing, if Medical or<br/>23 Mental Health determines the inmate is not fit<br/>24 for segregation, he will not be placed into that</p> |
| Page 47  | Page 49   |
| <p>1 Isn't that correct? I'm asking just --<br/>2 A. No. You're twisting this. And I just want to be<br/>3 clear that you're twisting this.<br/>4 What I told the Lieutenant from the information<br/>5 that he gave me, which is on that memorandum, is my<br/>6 decision to have the inmate placed into Administrative<br/>7 Segregation because I know that that inmate is going to<br/>8 see Mental Health. And he had -- any issues that he's<br/>9 having, he would display them to Mental Health.<br/>10 He has to be evaluated to be placed in any kind of<br/>11 special management housing.<br/>12 Q. My question -- and I will go back to the<br/>13 hypothetical. I'm ask you in that hypothetical that<br/>14 was just laid out to you. If you had that additional<br/>15 information, would you have still made -- would you<br/>16 have still made the decision to recommend placing that<br/>17 particular prisoner into Administrative Placement at<br/>18 the House of Correction, or would you have sent that<br/>19 particular prisoner somewhere else?<br/>20 MR. MAGUIRE: Object to the form.<br/>21 You can answer.<br/>22 THE WITNESS: If I had that type of<br/>23 information, I would still recommend for<br/>24 Administrative Segregation. However, I would</p> | <p>1 housing. Depending on the severity of it<br/>2 determines whether he is housed in PHSW for<br/>3 mental health or medical reasons.<br/>4 He won't necessarily have to be housed<br/>5 in Mental Health or in the medical area. He<br/>6 just would not be deemed fit for the<br/>7 segregation.<br/>8 BY MR. WILSON:<br/>9 Q. Based on your training and experience, if a<br/>10 prisoner has told other prison officials, hey, I want<br/>11 to harm -- I will harm myself or others, should that --<br/>12 based on your training and experience, should that<br/>13 particular prisoner be placed in Administrative<br/>14 Placement in a cell by him or herself?<br/>15 MR. MAGUIRE: Object to the form.<br/>16 Again, this -- you can answer if you understand<br/>17 the question.<br/>18 THE WITNESS: If an inmate says he<br/>19 wants -- I want to hurt myself, I am going to<br/>20 hurt myself, then again, the officer will do an<br/>21 emergency referral. That's not something that I<br/>22 would do.<br/>23 BY MR. WILSON:<br/>24 Q. Right. What would you do?</p>  |

13 (Pages 46 to 49)

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|---|---|
| <p>1 A. It would be done before it got to me. I<br/>2 wouldn't -- if the Lieutenant calls me and says, oh, he<br/>3 wants to hurt himself or he's going to hurt someone<br/>4 else --<br/>5 Q. Which happened here in the Gene Wilson case,<br/>6 correct?<br/>7 A. Correct.<br/>8 Q. Okay. Go ahead.<br/>9 A. I said, place him in Ag Seg because I --<br/>10 Q. Hold, hold. Ag what?<br/>11 MR. MAGUIRE: Ad Seg.<br/>12 THE WITNESS: Because through the<br/>13 policy, it's clearly stated: Bring harm to<br/>14 himself or others. And I knew he would see<br/>15 Mental Health at the same time.<br/>16 BY MR. WILSON:<br/>17 Q. Right. I'm asking you if based on your training,<br/>18 it's a different question -- trying to make it a<br/>19 different question.<br/>20 Based on your training and experience, is it -- are<br/>21 you trained to put prisoners who have told other<br/>22 prisoner officials, hey, I'm going to harm myself or<br/>23 others, is it fine under the prison rules and<br/>24 regulation to then put that person in Administrative</p> | <p>1 Q. You can tell me about ASD?<br/>2 A. I can tell you about ASD then.<br/>3 Q. Tell me about ASD then as far as that question is<br/>4 concerned?<br/>5 A. ASD we have nurses, the same amount of nurses that<br/>6 we have through the week. Only one we don't have is<br/>7 phlebotomist for blood work. Other than that, we are<br/>8 staffed.<br/>9 Q. Who would be able to answer -- those -- these<br/>10 questions about the HOC at the House of Correction?<br/>11 A. House of Correction staffing. I'm -- well, since<br/>12 it's now decommissioned.<br/>13 Q. Right. As of 2016, was there a Deputy Warden of<br/>14 the House of Correction?<br/>15 A. Yes.<br/>16 Q. Who would that have been, if you know?<br/>17 A. Deputy Warden Edward Miranda and Deputy Warden<br/>18 Marvin Porter.<br/>19 Q. Do you know Deputy Warden Miranda?<br/>20 A. Yeah, I know him.<br/>21 Q. Is that the same person as a Major Miranda?<br/>22 A. Deputy Warden and Major are the same.<br/>23 Q. Oh.<br/>24 A. It's a slang.</p> |
| Page 51   | Page 53   |
| <p>1 Segregation?<br/>2 MR. MAGUIRE: Object to the form.<br/>3 You can answer.<br/>4 THE WITNESS: It's okay to request for<br/>5 that inmate. In my training --<br/>6 MR. WILSON: Right.<br/>7 THE WITNESS: -- it's okay for me to<br/>8 request for that inmate to go into<br/>9 Administrative Segregation.<br/>10 BY MR. WILSON:<br/>11 Q. Okay.<br/>12 Is there a difference between the number of nurses<br/>13 and doctors on weekend shift at the House of Correction<br/>14 in -- now I'm talking about 2016 when you were the<br/>15 Deputy Warden at the House of Correction; is that<br/>16 correct?<br/>17 A. No.<br/>18 Q. You were at ASD?<br/>19 A. Correct.<br/>20 Q. Excuse me. Is there a difference in the number of<br/>21 nurses and doctors who are dealing with prisoners on<br/>22 the weekends as opposed to the weekdays?<br/>23 A. I can't tell you anything about the House of<br/>24 Correction staffing.</p>  | <p>1 Q. I didn't know.<br/>2 A. Okay.<br/>3 Q. Thank you. Because I met him recently.<br/>4 MR. WILSON: Off the record.<br/>5 - - -<br/>6 (At this time, a discussion was held off<br/>7 the record.)<br/>8 - - -<br/>9 BY MR. WILSON:<br/>10 Q. What, to the best of your recollection, are the<br/>11 rules and regulations -- internal rules and regulations<br/>12 supposed to be for inspecting and reviewing prison<br/>13 cells when the prisoners are in there?<br/>14 A. Inspecting?<br/>15 Q. Yeah. Do they have a -- what's the rules and<br/>16 regulations for going and checking the cells on a daily<br/>17 basis?<br/>18 Are there any prison rules and regulations<br/>19 regarding the checking of the cells?<br/>20 MR. MAGUIRE: Object to the form.<br/>21 You can answer.<br/>22 THE WITNESS: Tours are made every half<br/>23 hour in all institutions.<br/>24 MR. WILSON: Okay.</p>  |

14 (Pages 50 to 53)

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|---|---|
| <p>1 BY MR. WILSON:<br/>2 Q. You just took care of my other question.<br/>3 A. We do sanitation and security checks on each shift.<br/>4 Q. When those sanitations and security checks are<br/>5 done, is there a sign-in sheet or a log of some sort<br/>6 that the correctional officer is supposed to sign or<br/>7 with a date and a time or something like that?<br/>8 A. Yes.<br/>9 Q. Okay. And who houses those -- who has those logs<br/>10 or keeps them?<br/>11 A. They are normally maintained via the Warden's<br/>12 office. If they are ever needed, we do keep them.<br/>13 Q. Are they maintained then, for example, Major<br/>14 Miranda would have the logs for the House of<br/>15 Correction? You would have the logs in 2016 for ASD<br/>16 and so forth and so on?<br/>17 Is that the way it works?<br/>18 A. The paperwork is turned into -- it's sheets. It's<br/>19 not logbooks. But they are turned into the Warden's<br/>20 office. And the Warden's office maintains them, not<br/>21 the Deputy Wardens.<br/>22 Q. Okay. So my question is, is it the Warden of each<br/>23 prison or is there, like, one central place where all f<br/>24 the logbooks from the different prisons on State Road</p> | <p>1 performance of your duties. If I look in the logbook<br/>2 and see you haven't made a tour for two hours, we have<br/>3 a problem. You are supposed to make those tours.<br/>4 Q. What happens in that situation?<br/>5 A. Disciplinary action normally.<br/>6 Q. Ranging from what to what?<br/>7 A. From a counseling, verbal warning. Works it way<br/>8 up.<br/>9 Q. Depending on the amount of times the correctional<br/>10 officer may have been derelict in his -- that<br/>11 particular duty?<br/>12 A. Correct.<br/>13 Q. Okay. Are the correctional officers instructed to<br/>14 make any special notations when they -- when they write<br/>15 into the log?<br/>16 A. Yes. Anything out of the ordinary course of the<br/>17 day is supposed to be noted in your log. Any<br/>18 occurrence.<br/>19 Q. If a correctional officer falls to, for whatever<br/>20 reason, to not -- I know what you mean by -- I am using<br/>21 your definition. I am using my word inspection because<br/>22 it popped into my head.<br/>23 During a tour, if they fail to do a tour on the --<br/>24 in that 30-minute increment, are they told to put an</p>   |
| Page 55   | Page 57   |
| <p>1 go to?<br/>2 A. Oh, no. No. No. No. Each institution has their<br/>3 own paperwork.<br/>4 Q. And that would, essentially, be at the Warden's<br/>5 office of that particular prison?<br/>6 A. Wherever the Warden maintains it at, yes.<br/>7 Q. Okay. All right.<br/>8 Are there penalties if correctional officers do not<br/>9 check on cells every, you said, 30 minutes or so?<br/>10 A. Penalties?<br/>11 Q. Yeah. Penalties for the correctional officers in<br/>12 failing to do that or failing to inspect those cells<br/>13 and look at those cells?<br/>14 A. Well, yes.<br/>15 Q. What, if anything -- what kind of penalties would<br/>16 the correctional officer be subject -- potentially<br/>17 subject to?<br/>18 A. If I can go back. You keep saying inspect the<br/>19 cell. Every 30 minutes when an officer is touring,<br/>20 they are not going inside of each cell checking the<br/>21 windows and thing of that nature. They are touring and<br/>22 looking into the cells to make sure everything is okay<br/>23 visually.<br/>24 And if you fail to do that, it's an inefficient</p>   | <p>1 explanation for why they didn't conduct the tour during<br/>2 that every 30-minute increment?<br/>3 A. Well, when I say 30 minutes, it's not going to be<br/>4 exact 30 minutes. It's an approximate. Because if the<br/>5 population knows he came at one, he will be here at<br/>6 one-thirty. He will be here at two. Whatever I'm<br/>7 doing, I'm going to stop doing it in between that time.<br/>8 Within that 30-minute period.<br/>9 So, you may tour at one o'clock. I may look and<br/>10 see that you toured at one-twenty. So, I just make<br/>11 sure that you are touring that -- within that hour,<br/>12 that cell has been looked into twice. So, I'm not<br/>13 saying it's a definite if you start at eleven a.m.,<br/>14 eleven-thirty there is tour, I mean, twelve o'clock<br/>15 there is a tour, twelve-thirty. They have to tour<br/>16 within a 30-minute window.<br/>17 So, let me make that clear. I mean --<br/>18 Q. Okay.<br/>19 A. You know.<br/>20 Q. How many -- in the course of your experience at the<br/>21 prison, how many prison suicide cases have you<br/>22 personally dealt with?<br/>23 A. Define "dealt with"?<br/>24 Q. Reviewed paperwork, been a part of an</p> |

15 (Pages 54 to 57)

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|--|---|
| <p>1 investigation, spoken to other prison officials about.<br/>2 A. Maybe three.<br/>3 Q. Okay. What years, if you recall?<br/>4 A. This year -- this year was my most recent.<br/>5 Q. So, three in 2018?<br/>6 A. Three?<br/>7 Q. You said three.<br/>8 A. Not three in 2018.<br/>9 Q. You mean three total?<br/>10 A. Yeah. Maybe about three total, yeah.<br/>11 Q. How many in -- let's start in 2016. Besides Gene<br/>12 Wilson, anyone else that you can recall in 2016 of<br/>13 those three?<br/>14 A. No, not really.<br/>15 Q. Okay. What about 2017?<br/>16 A. No.<br/>17 Q. Would it have to be two in 2018?<br/>18 MR. MAGUIRE: She's saying three since<br/>19 1983.<br/>20 THE WITNESS: Right.<br/>21 BY MR. WILSON:<br/>22 Q. Three since 1983. Thank you for the clarification.<br/>23 I wasn't aware of that.<br/>24 MR. MAGUIRE: Sorry.</p>  | <p>1 A. No. Gene Wilson is the only suicide that my name<br/>2 was --<br/>3 Q. Attached to?<br/>4 A. I had to write a memo for.<br/>5 Q. Because of your conversation with the Lieutenant?<br/>6 A. Just the one, yes.<br/>7 Q. That's writing a memo because you were attached to<br/>8 it. But are you telling me you had no other experience<br/>9 with dealing with suicides at the prison other than<br/>10 Gene Wilson?<br/>11 A. Directly. No, I have not.<br/>12 Q. What about indirectly?<br/>13 A. Yes.<br/>14 Q. In what respect indirectly?<br/>15 A. Well, I think I was working at PICC when a guy had<br/>16 a successful suicide.<br/>17 Q. What year would that have been?<br/>18 A. I don't know. Could be 2010.<br/>19 Q. What were you doing --<br/>20 A. I think. I'm not sure.<br/>21 Q. What were you doing at PICC in 2010 or so? What<br/>22 was your job description?<br/>23 A. Well, I was a Captain there and I was a Deputy<br/>24 Warden there. I really don't know which --</p>  |
| Page 59  | Page 61   |
| <p>1 MR. WILSON: You want to testify?<br/>2 (Laughter.)<br/>3 BY MR. WILSON:<br/>4 Q. I mean, it helps out. Sometimes you need<br/>5 clarification. Three since 1983.<br/>6 And for each one, how did you -- what was your<br/>7 involvement in each one?<br/>8 Strike that. Let me save you a little bit of time.<br/>9 You already testified as to your involvement in<br/>10 reference to the Gene Wilson matter in 2016, correct?<br/>11 A. Correct.<br/>12 Q. Is there anything else that you did in reference to<br/>13 the Gene matter in 2016?<br/>14 A. No.<br/>15 Q. Okay. Let's go on the other two then.<br/>16 A. Well, one was at my institution as Warden. And I<br/>17 actually -- no, I'm sorry. That was not a suicide.<br/>18 Sorry.<br/>19 Q. We're down to two.<br/>20 A. House of Correction, sorry, again. That was not a<br/>21 suicide. One suicide.<br/>22 Q. So, you're telling me the one -- we're down from<br/>23 three to one. And that would have been -- I'm assuming<br/>24 you're talking about Gene Wilson then?</p> | <p>1 Q. In what capacity you were dealing with that?<br/>2 A. Yes. Yes.<br/>3 Q. Okay. Just real quick. Presently today, you said<br/>4 your job title has changed again.<br/>5 You are Warden?<br/>6 A. Yes.<br/>7 Q. Warden of what?<br/>8 A. The Detention Center.<br/>9 Q. Okay. And you've been a Warden for the Detention<br/>10 Center for how long?<br/>11 A. Seven months.<br/>12 Q. Okay. In what -- in reference to that suicide,<br/>13 what, if anything, was your involvement -- how were you<br/>14 involved in that? Just physically being there or<br/>15 seeing the --<br/>16 A. It wasn't a suicide. Remember I said, no, it<br/>17 wasn't a suicide? He just died.<br/>18 Q. It was a prison death?<br/>19 A. Yes.<br/>20 Q. Okay. So, I want to make sure we are clear here.<br/>21 Other than Gene Wilson, that's -- this is the only<br/>22 suicide -- prison suicide that you have dealt with?<br/>23 A. Directly, yes.<br/>24 Q. And how many have you dealt with indirectly then?</p> |

16 (Pages 58 to 61)



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1 A. I believe one when I was at PICC.  
2 Q. Okay. That's the other one. Okay.  
3 But you -- I thought you just said that was the one  
4 that may not have been a suicide, that may have been a  
5 prison death?  
6 A. No. We had a death and we had a suicide.  
7 Q. Okay.  
8 A. A few years ago.  
9 Q. Are you aware, according to Major Miranda, there  
10 was an additional suicide in 2017 at the House of  
11 Correction across from, unfortunately, where  
12 Mr. Wilson's cell was located in Cell 555?  
13 A. I had no idea.  
14 Q. Okay. Are you -- in reference to the Gene Wilson  
15 case, are you aware that -- did you know that there  
16 were allegedly two prisoners in other cells who heard  
17 Mr. Wilson getting ready to kill himself?  
18 Were you aware of that?  
19 A. No, I was not.  
20 Q. Based on your training and experience, when a  
21 prison official finds out that a prisoner wants to harm  
22 himself and will -- says he will harm himself, he will  
23 harm others, he's -- get the correct wording here.  
24 Give me one second.

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1 He's anxious. He's depressed. He's nauseous and  
2 has expressed illogical ideas and is afraid for no  
3 reason as examples. In that situation, based on your  
4 training and experience, what is that particular prison  
5 official suppose to do with that information?  
6 MR. MAGUIRE: Object to the form.  
7 You can answer.  
8 THE WITNESS: If an officer receives  
9 that information, the officer is supposed to do  
10 an emergency referral. Goes into the computer  
11 and he puts that information in. And what comes  
12 out --  
13 BY MR. WILSON:  
14 Q. Let me stop you for a second. Emergency referral,  
15 this is on your internal prison computer; is that  
16 correct?  
17 A. Correct.  
18 Q. It says emergency referral on it?  
19 A. Well, let me go back. They do a mental health  
20 referral. Depending on the information that goes into  
21 the computer, then the results will come out. Either  
22 it would be an urgent referral or an emergency referral  
23 or routine referral depending on the information that's  
24 put in.

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1 And at that point, once the referrals is put into  
2 the computer, Mental Health is alerted. And they will  
3 call for the inmate to come to Mental Health to be  
4 evaluated.  
5 Q. With that information, the hypothetical that I just  
6 gave you, is that -- that's what that particular prison  
7 official is supposed to do, if that -- armed with that  
8 information that particular prison official doesn't do  
9 that, is that prison official supposed to be  
10 disciplined in any way for violating internal prison  
11 rules and regulations?  
12 MR. MAGUIRE: Object to the form.  
13 BY MR. WILSON:  
14 Q. Do you understand the question?  
15 A. Yeah. I do understand the question. But --  
16 MR. MAGUIRE: I'm just going to object  
17 to the form. I want to clarify what the  
18 hypothetical is. This is that one --  
19 BY MR. WILSON:  
20 Q. Here is the hypothetical. I will put it back on  
21 the record again so we're clear.  
22 MR. MAGUIRE: I understand. But what my  
23 question is about the hypothetical as you  
24 presented it, are you saying that the prison

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1 official gets all of that information at once?  
2 Like, at one time he gets all that information?  
3 MR. WILSON: Yes.  
4 MR. MAGUIRE: Okay.  
5 BY MR. WILSON:  
6 Q. Do you understand the question?  
7 A. I understand the question.  
8 Hypothetically, you said that different people  
9 added different information. One person added this  
10 information, another one added this information and  
11 another one added that information. All the  
12 information added together is different than this  
13 information here and then this officer's information  
14 here and then that officer has information there.  
15 Each time information is given and it's placed into  
16 the computer for mental health access, it will come up  
17 determining what kind of referral it is. If all that  
18 information that you just stated was given to one  
19 person, that information should have been put into the  
20 computer for Mental Health, and a referral would have  
21 been generated. Mental Health would have called for an  
22 interview and evaluation of that inmate.  
23 Q. If the prison official did not, however in that  
24 hypothetical, put that information in and contact

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|--|--|
| <p>1 Mental Health, if that part was not done, what, if<br/>2 anything -- based on your experience and position,<br/>3 what, if anything, is supposed to happen to that<br/>4 particular prison official for not inputting that<br/>5 information and notifying Mental Health?<br/>6 A. They would have to explain why it wasn't put in.<br/>7 Why wasn't a referral generated? They would have to<br/>8 explain that. And then from the explanation, whatever<br/>9 was deemed necessary by the supervisor would happen.<br/>10 I'm not really sure.<br/>11 Q. So is it safe to say that, in reference to the Gene<br/>12 Wilson case, this is really the first and only time<br/>13 that you relied on -- that regulation, the internal<br/>14 prison regulation, where you put in bold -- did you put<br/>15 this in bold, or did someone else put this in bold for<br/>16 you?<br/>17 A. I don't recall to be honest with you.<br/>18 Q. Just for the record, I'm looking at Wilson-1, the<br/>19 last sentence or statement in then Deputy Warden Cathy<br/>20 Talmadge's memorandum to Lieutenant R. Murray. It says<br/>21 in bold: "Inmate, in the judgment of staff, may for<br/>22 any reason pose a threat to himself, herself, others or<br/>23 the security of the facility."<br/>24 MR. MAGUIRE: And the document will</p> | <p>1 Q. What do they -- what do they do?<br/>2 A. They do all the classification of the inmate<br/>3 population, the movement. Every inmate that is<br/>4 accepted in the Philadelphia Department of Prisons,<br/>5 their paperwork comes through CMR. And they determine,<br/>6 like, if their sentences come from the judge, they<br/>7 calculate sentences or probation, parole detainers.<br/>8 All paperwork pertaining to the inmates intake and<br/>9 release --<br/>10 Q. Do they have to do --<br/>11 A. -- are there?<br/>12 Q. I apologize. Were you finished?<br/>13 A. I'm done.<br/>14 Q. Okay. Do they have anything to do with<br/>15 facilitating the placement of prisoners? After you<br/>16 made the decision to place Gene Wilson in<br/>17 Administrative Placement, did CMR get involved in that<br/>18 process? Anywhere in that process?<br/>19 A. Yes.<br/>20 Q. In this particular process as it relates to Gene<br/>21 Wilson, how is CMR involved?<br/>22 A. Once the inmate is medically and Mental Health has<br/>23 cleared them, then the inmate is transferred -- CMR<br/>24 facilitates the transfer from one facility to the</p>       |
| Page 67  | Page 69  |
| <p>1 speak for itself. But describing that as a<br/>2 statement, I believe, is somewhat inaccurate.<br/>3 It follows a colon where it says, I based this<br/>4 decision on the specs of the Administrative<br/>5 Placement, colon, and then provides that<br/>6 sentence.<br/>7 But the document will speak for itself.<br/>8 MR. WILSON: It's correct.<br/>9 BY MR. WILSON:<br/>10 Q. My question was -- I think you answered it already.<br/>11 You don't know, you don't have an independent<br/>12 recollection of, yeah, I pressed the bold button.<br/>13 You just don't know, right?<br/>14 A. You asked me three different things.<br/>15 Q. Okay. Let me try it again.<br/>16 Do you have an independent recollection of the<br/>17 statement that's in black and in bold down at the<br/>18 bottom of your statement, whether or not you made<br/>19 that -- those letters bold or did someone else do that?<br/>20 A. This is my memo. I wrote it.<br/>21 Q. Right.<br/>22 A. I am pretty sure I did do that.<br/>23 Q. Okay. What is CMR?<br/>24 A. Classification Movement and Records.</p>   | <p>1 other.<br/>2 Q. What does that mean they facilitate the transfer?<br/>3 Tell me. I don't want to guess.<br/>4 What exactly do you mean?<br/>5 A. Okay. They write up a petition for the inmate to<br/>6 leave one institution and go to the additional<br/>7 institution. We just can't take a inmate and say you<br/>8 are going to the House of Correction. It has to be<br/>9 facilitated through CMR. All paperwork has to be in<br/>10 order for that inmate to go to that institution.<br/>11 Q. Right.<br/>12 A. Because of classification issues, we have to be<br/>13 sure that the inmate can house in certain institutions.<br/>14 Q. Is D Block -- isn't it true that D Block on the<br/>15 House of Correction is considered the punitive block<br/>16 for prisoners? Solitary confinement and the like?<br/>17 A. There is D1 and D2. So, D1 or D2?<br/>18 Q. Where was Mr --<br/>19 A. I put him over to Administrative Seg at the House<br/>20 of Correction.<br/>21 Q. Is that considered D1 or D2 to the best of your<br/>22 experience?<br/>23 A. When I worked there, it was D1.<br/>24 Q. Okay. What did -- is D1 considered like the block?</p> |

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|---|---|
| <p>1 A. The Special Management Housing Unit, yes.<br/>2 Q. Is there a colloquial word that prison officials<br/>3 and prisoners use for D Block, called the hole or<br/>4 something like that?<br/>5 A. D1 rear is punitive segregation. And people call<br/>6 that the hole. And that's in the rear of D1.<br/>7 Q. Okay. That's in the rear of D1, but that's still<br/>8 D1?<br/>9 A. Yes.<br/>10 Q. That what is D2? What is that considered?<br/>11 A. General population.<br/>12 Q. Okay. All right.<br/>13 So you -- did you have -- just for the record, did<br/>14 you have -- did you -- was Mr. Wilson placed into the<br/>15 rear of D1?<br/>16 A. I don't know where he was housed.<br/>17 Q. Okay.<br/>18 A. He was transferred to House of Correction.<br/>19 Q. You were the Deputy Warden at the time of ASD. Why<br/>20 did you make the recommendation to transfer him to<br/>21 Administrative Placement at the House of Correction?<br/>22 Should that have not been done by Major Miranda?<br/>23 MR. MAGUIRE: Object to the form.<br/>24 You can answer.</p>   | <p>1 Q. Other than that one?<br/>2 A. When you say deaths, there are deaths and then<br/>3 there are suicides.<br/>4 Q. That is correct. That's why I said I was dividing<br/>5 them up.<br/>6 A. Deaths?<br/>7 Q. Yes.<br/>8 A. Is that including suicides or people that died?<br/>9 Q. Includes everything where it resulted in death.<br/>10 A. It's a few. I have had two at my jail.<br/>11 Q. You been at several jails. Where are you talking?<br/>12 A. When I say "my jail", as the Warden. Two.<br/>13 Q. At the DC?<br/>14 A. Yes.<br/>15 Q. In what year?<br/>16 A. 2018.<br/>17 Q. Okay. And now the next question is, 2018, those<br/>18 two, neither one were suicides; is that correct?<br/>19 A. Correct.<br/>20 Q. What about in 2017, the general question. Deaths<br/>21 in 2017 that you're aware of?<br/>22 A. I was at ASD. I think someone died there, too, in<br/>23 2017.<br/>24 Q. And suicides, though, none, correct?</p>   |
| Page 71   | Page 73   |
| <p>1 THE WITNESS: No. The inmate was a ASD<br/>2 inmate. I placed him into segregation housing.<br/>3 Administrative Segregation, we do not have that<br/>4 at ASD. All inmates that require special<br/>5 management housing from ASD are transferred to<br/>6 House of Correction for that special management<br/>7 housing. So, Major Miranda would have nothing<br/>8 to do with it until that inmate is actually<br/>9 housed at the House of Correction.<br/>10 BY MR. WILSON:<br/>11 Q. Okay. Were you aware in 20 -- for example, in<br/>12 2016, were you aware that there were approximately 19<br/>13 prison deaths in 2016 according to a newspaper article<br/>14 had done some research of prisoners up on State Road?<br/>15 A. I knew we had a few, yes.<br/>16 Q. To the best of your recollection as of right now,<br/>17 if you know, how many prison deaths -- I will start<br/>18 with that. How many prison deaths have you had up on<br/>19 State Road in 2017?<br/>20 A. I can't tell you.<br/>21 Q. Do you have a number or you just don't know?<br/>22 A. I just don't know.<br/>23 Q. Same with 2018. Just don't know?<br/>24 A. I know one.</p> | <p>1 A. Yeah. Not that I recall.<br/>2 Q. Give me one second please. I'm actually almost<br/>3 done.<br/>4 To the best of your recollection, do you know --<br/>5 well, you worked at the House of Correction at one<br/>6 point. What kind of emergency medical equipment is<br/>7 housed at the House of Correction in relation to, for<br/>8 example, performing, I don't know, CPR and things like<br/>9 that, if you know?<br/>10 A. You mean with medical or with correctional staff?<br/>11 Q. Start with the correctional staff, and then with<br/>12 medical if you know.<br/>13 A. Well, I know we have AED machine that correctional<br/>14 staff have.<br/>15 Q. Was that there as of 2016 if you know?<br/>16 A. Yes.<br/>17 Q. That's what I'm asking about. Just that year.<br/>18 A. Yes.<br/>19 Q. Okay. Go ahead.<br/>20 A. And then the medical has the AED, oxygen, first aid<br/>21 kits. All officers are equipped with the<br/>22 mouth-to-mouth resuscitation kits.<br/>23 Q. What's a mouth-to-mouth resuscitation kit?<br/>24 A. It's a little plastic tube. That if we have to</p> |

1 perform CPR on a person, it's the connector from your  
2 mouth to the inmate's mouth so you don't have to have  
3 direct contact for -- to administer CPR and the  
4 breathing techniques.

5 Q. And you're saying all correctional officers have  
6 that?

7 A. Yes.

8 Q. Is that somewhere, like, on their uniform? Or is  
9 that housed in a particular area?

10 A. It's on their belt.

11 Q. It's on their belt?

12 A. Yes.

13 Q. As of 2016, were there any cameras inside of that  
14 prison?

15 A. Which prison?

16 Q. House of Correction.

17 A. Not that I know of, no.

18 Q. So other than the tour, there is no way for  
19 correctional officers or supervisors to monitor the  
20 prisons electronically or by video, correct --

21 A. Correct.

22 Q. -- in that prison?

23 As of 2016, based on your experience at the House  
24 of Correction, were the correctional officers generally

## CERTIFICATION

I, hereby certify that the proceedings and  
evidence noted are contained fully and accurately in  
the stenographic notes taken by me in the foregoing  
matter, and that this is a correct transcript of the  
same.

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ANGELA M. KING, RPR,  
Court Reporter, Notary Public

(The foregoing certification of  
this transcript does not apply  
to any reproduction of the same  
by any means, unless under the  
direct control and/or  
supervision of the certifying  
reporter.)

1 given training in how to perform CPR?

2 A. All officers go through their training academy and  
3 they learn CPR, and they do retraining every so many  
4 years for your CPR training.

5 Q. Do they get, like, a certificate, for example, if  
6 they complete the retraining?

7 A. Yes.

8 Q. At the House of Correction, if you know based on  
9 your experience and recollection as of 2016, did you

10 know Mary Lou Orgasan. A woman named -- a nurse named  
11 Mary Lou Orgasan?

12 A. No. I don't know her. I have seen her name, but I  
13 don't know her.

14 Q. I don't have any other questions.

15 MR. MAGUIRE: Nothing for me.

16 THE WITNESS: Thank you very much.

17 (At this time, the deposition concluded  
18 at 10:26 a.m.)  
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